

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

Cub Club Investment, LLC,

Plaintiff,

V.

Apple Inc.,

Defendant.

Case No. 6:20-cv-856-ADA-JCM

**UNOPPOSED MOTION TO EXTEND DEADLINE TO RESPOND
TO PLAINTIFF’S COMPLAINT**

Defendant Apple Inc. moves pursuant to Federal Rule of Civil Procedure 6(b) to extend the deadline to answer or otherwise respond to Plaintiff's Complaint (the "Complaint") (Dkt. 1) to November 11, 2020.

Plaintiff filed the original complaint on September 18, 2020. Dkt. 1. Apple was served on September 21, 2020, triggering a response date of October 12, 2020. Dkt. 10. The 27-page Complaint asserts five causes of action, including infringement of 30 separate copyright registrations. Apple recently retained counsel, who would benefit from additional time to evaluate and respond to the allegations in the Complaint.

For the foregoing reasons, Apple respectfully requests that the Court extend its deadline to answer, move to dismiss, or otherwise respond to the Complaint by 30 days, up to and including November 11, 2020. Counsel for Apple has conferred via telephone with counsel for Plaintiff, who does not oppose the extension.

Dated: October 7, 2020

Respectfully submitted,

/s/ Carolyn M. Homer

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**pro hac vice applications to be submitted*

Counsel for Defendant Apple Inc.

CERTIFICATE OF CONFERENCE

On October 6, 2020, Plaintiff's counsel stated that they did not oppose a 30-day extension of Apple Inc.'s time to answer, move to dismiss, or otherwise respond to Plaintiff's Complaint, up to and including November 11, 2020.

/s/ Carolyn M. Homer
Carolyn M. Homer

CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2020, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which will send notifications of such filing to all counsel of record.

/s/ Carolyn M. Homer

Carolyn M. Homer